

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO.: 0:22-cv-62268-BB

JESSE IWUJI MOTORSPORTS, LLC,

Plaintiff,

v.

EQUITY PRIME MORTGAGE, LLC,

Defendant.

_____ /

PROPOSED VOIR DIRE QUESTIONS FOR THE VENIRE PANEL

Plaintiff/Counter-defendant, JESSE IWUJI MOTORSPORTS, LLC (“Plaintiff” or “JIM”) and Defendant/Counterclaimant, Equity Prime Mortgage, LLC (“Defendant” or “EPM”) hereby provide the following joint proposed voir dire questions for the venire panel:

1. What is your name and date of birth?
2. Please describe your current employment, and past work history.
3. What is your educational background (i.e., grade school, high school, college, etc.).
4. Please describe your spouse or partner’s current and past occupation and describe his/her educational background.
5. If you have any adult children, describe their level of schooling and/or employment.
6. Have you served in the military? If so, please describe such service.
7. Have you ever served on a jury before? If so, state how many times; the type of case; whether the trial was in state or federal court; if you reached a verdict and if you were the foreperson.
8. Would you briefly describe any personal hobbies and/or interests you have?

9. What newspapers and/or magazines do you read regularly? Also, what are your favorite T.V. shows and/or websites?
10. Have any of you ever been involved in a sponsorship agreement, either as a sponsor or as the party being sponsored?
11. Have you ever been involved with NASCAR, either as a sponsor, employee, independent contractor, or partner?
12. Do you use Social Media? What Social Media sites do you use?
13. Do you use social medial as a consumer or as a content creator?
14. Have you ever been paid for posting on social media?
15. Have you ever represented, in any capacity, someone who has posted on social media.
16. Do you know anyone who has ever been paid for posting on social media?
17. Has your employer ever required you to post on social media?
18. Have you ever been fired for not following your employer's social media rules or polies?
19. Have you ever been employed or served as an independent contractor for a lender?
20. Have you ever been employed or served as an independent contractor for a company in the mortgage space?
21. Do any of you have any personal or professional relationships with individuals or companies involved in sponsorship agreements?
22. Have you ever been a party to a legal dispute or lawsuit involving a contract or agreement?
23. Do you follow or are you a fan of NASCAR, if so, in what capacity?
24. Do you follow any NASCAR personalities on social media? If so, which ones?
25. Have you ever been employed as an employee or independent contractor with NASCAR of NFL football?

26. If you follow NASCAR can you consider its involvement in this case fairly and impartially to both parties?
27. Do you believe that NASCAR teams are overpaid for the services they provide to sponsors?
28. If you follow NFL Football, are you a Dallas Cowboys fan?
29. Are you familiar with Emmitt Smith, and, if so, can you consider his involvement in this case, like any other individual in a fair and impartial manner to both parties?
30. Do you believe a well-known sports personality's involvement or testimony in the case should be considered and given the same weight as any other party or witness?
31. Can you set aside any personal opinions or biases you may have and decide this case based solely on the evidence presented in court?
32. Are any of you familiar with the specific terms and conditions commonly found in sponsorship agreements?
33. How do you feel about the role of a jury in resolving legal disputes?
34. Are there any reasons why you feel you cannot be fair and impartial in this case?
35. Do you understand the concept of burden of proof, and are you willing to apply it as instructed by the court?
36. Are you comfortable making decisions based on the law as instructed by the judge, even if you personally disagree with the law?
37. Have you formed any opinions about the case based on what you have heard or read outside of the courtroom?
38. Can you assure us that you will base your decision solely on the evidence presented in court and the instructions given by the judge?

39. Is there anything else about your background or experiences that you believe is important for us to know in considering your suitability as a juror in this case?
40. If you and/or a close family member or friend has ever been a party to a lawsuit (i.e., sued someone or been sued by someone) please describe the circumstances.
41. Do you participate in any organizations or groups (community, social, civil, union, religious, political)? _____ If yes, please state the name of the group and if you hold a leadership position.
42. Is there anything in your background or personal feelings which might affect your ability to be fair and impartial to both sides?

Jointly and respectfully submitted,

HEITNER LEGAL, P.L.L.C.

By: /s/ Darren A. Heitner
Darren A. Heitner (Fla. Bar No. 85956)
215 Hendricks Isle
Ft. Lauderdale, Florida 33301
Telephone: (954) 558-6999
E-mail: darren@heitnerlegal.com

Attorney for Plaintiff/Counter-Defendant

KREINER BURNS

BY: /S/ Seth A. Kreiner
Seth A. Kreiner, Esq.,
Florida Bar No.: 432040
950 Peninsula Corporate Circle/Suite 3001
Boca Raton / Florida / 33487
(p)(561)901-8400 (f)(561)666-9700
E-Mail: seth@kreinerlawfirm.com

Attorney for Defendant/Counter-Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2024, a true and correct copy of the foregoing was electronically filed using CM/ECF and via email.